

## EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

|                             |   |                               |
|-----------------------------|---|-------------------------------|
| <b>LORI HELING,</b>         | ) |                               |
|                             | ) |                               |
| <b>Plaintiff,</b>           | ) | <b>2:15-cv-01274-JPS</b>      |
|                             | ) |                               |
| <b>v.</b>                   | ) | <b>Judge Stadtmueller</b>     |
|                             | ) | <b>Magistrate Judge Jones</b> |
| <b>CREDITORS COLLECTION</b> | ) |                               |
| <b>SERVICE, INC.,</b>       | ) |                               |
|                             | ) |                               |
| <b>Defendant.</b>           | ) |                               |

**PLAINTIFF'S AMENDED DISCLOSURES PURSUANT TO F. R. CIV. P. 26(a)(1)(A)**

NOW COMES the Plaintiff, LORI HELING, by and through her attorneys, SMITHMARCO, P.C. and for her initial disclosures pursuant to F. R. Civ. P. 26(a)(1)(A), Plaintiff states as follows:

These disclosures are predicated upon information reasonably available to Plaintiff at the time that these disclosures are being served. In making these disclosures, Plaintiff makes no representation that she is identifying and/or producing every document, individual or other evidence that Plaintiff may potentially use to support the allegations contained in her complaint. Rather, Plaintiff has made a good faith effort to ensure the accuracy and completeness of the information contained herein.

**(i) Individuals Likely to Have Discoverable Information:**

| Name & Address   | Subject(s) of Knowledge   |
|--|---|
| Lori Heling<br>c/o SmithMarco, P.C.<br>20 South Clark Street,<br>Suite 2120<br>Chicago, IL 60603<br>(312) 361-1690 | Plaintiff has information and knowledge regarding the facts supporting her claims in this action and her claimed damages. |

| Name & Address  | Subject(s) of Knowledge  |
|---|--|
| Creditors Collection Service, Inc.  | As yet unknown and unidentified representative(s), but believed to be Donald Waage, Nancy Wagner, and Vicky Barclay, have knowledge of the facts underlying the allegations in Plaintiff's Complaint, including knowledge of Plaintiff's alleged account information sent for collections by Dean R. Delasanta DDS SC, and any communications Creditors Collection Service, Inc., had with Plaintiff, Dean R. Delasanta DDS SC, or third-parties regarding the account at issue. |
| Dean R. Delasanta DDS SC  | As yet unknown and unidentified representative(s) have knowledge of the facts underlying the allegations in Plaintiff's Complaint, including knowledge of Plaintiff's alleged account information sent for collections by Dean R. Delasanta DDS SC, and any communications Creditors Collection Service, Inc., had with Plaintiff, Dean R. Delasanta DDS SC, or third-parties regarding the accounts at issue.   |
| Andrew Morgan, Esq<br>Morgan and Torry-Morgan<br>529 Ontario Avenue<br>Sheboygan WI 53081<br>(920) 458 4566 | Mr. Morgan is expected to have knowledge regarding the lawsuit filed against Plaintiff as detailed more fully in Plaintiff's complaint. Mr. Morgan is further expected to have knowledge of his communications with Plaintiff, with Defendant and communications between Plaintiff and Defendant.  |

In addition to the individuals identified above, Plaintiff further identifies the following individuals:

1. Any and all individuals identified by Defendant(s) and/or any other party.
2. Any and all individuals disclosed during the course of discovery.
3. Any individual identified or referenced in any documents produced or provided by Defendant(s) and/or any other party.
4. Any and all individuals deposed or referenced in any deposition undertaken in this matter.
5. Any and all individuals examined under oath or referenced in any examination under oath undertaken in this matter.
6. Any individuals necessary for the purpose of rebuttal or impeachment.

7. Any and all individuals, the identity of whom is yet to be determined.
8. Any and all individuals whose knowledge of relevant matters is yet to be determined.
9. Any and all rebuttal witnesses, yet to be identified.
10. Any and all individuals necessary to produce, identify and/or authenticate any document and/or other tangible thing.

(ii) **Documents, data compilations and tangible things:**

1. Court documents and file from the underlying collection action filed in the Circuit Court of Sheboygan County
2. Garnishment documents
3. Communications with collection law firm.
4. Any documents, data compilations, and tangible things identified in the course of discovery in this case, including during any depositions taken in this case.
5. Any documents, data compilations, and tangible things identified in Defendant's Rule 26(a)(1) disclosures and any supplemental disclosures made by Defendant.
6. Any documents, data compilations, and tangible things necessary for rebuttal.
7. Discovery is ongoing and Plaintiff reserves the right to amend the foregoing list of documents, data compilations, and tangible things pursuant to Fed. R. Civ. P. 26(e).

(iii) **Damages:**

Plaintiff claims all damages recoverable under the Fair Debt Collection Practices Act, including actual damages, and statutory damages in the amount of \$1,000.00. In addition to Plaintiff's claim for actual and statutory damages, Plaintiff claims her attorneys' fees and costs pursuant to 15 U.S.C. §1692k.

Respectfully submitted,  
**LORI HELING**

By: s/ David M. Marco  
Attorney for Plaintiff

Dated: June 10, 2016

David M. Marco (Atty. No.: 6273315)  
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| LORI HELING,         | ) |                        |
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| v.                   | ) | Judge Stadtmueller     |
|                      | ) | Magistrate Judge Jones |
| CREDITORS COLLECTION | ) |                        |
| SERVICE, INC.,       | ) |                        |
|                      | ) |                        |
| Defendant.           | ) |                        |

**CERTIFICATE OF SERVICE**

To: David M McDorman  
McDorman Law Office  
2923 Marketplace Drive, Suite 100  
Madison WI 53719  
david@mcdormanlaw.com

I, David M. Marco, an attorney, certify that on June 10, 2016, I shall caused to be served a copy of Plaintiff's Disclosures Pursuant to F. R. Civ. P. 26(a)(1), upon the above named individual(s) by: depositing same in the U.S. Mail box at 20 South Clark Street, Suite 2120, Chicago, IL 60603, prior to 5:00 p.m., postage prepaid; messenger delivery; Federal Express; facsimile transmitted from (888) 418-1277; and/or via email, as indicated below.

\_\_\_\_ U.S. Mail

\_\_\_\_ Facsimile

\_\_\_\_ Messenger Delivery

  x   Email

By:          s/ David M. Marco           
Attorney for Plaintiff

Dated: June 10, 2016

David M. Marco (Atty. No.: 6273315)  
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